

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
(Northern Division)

MELVIN NEWSOME, et al.

Plaintiffs,

v.

UP-TO-DATE LAUNDRY, INC., et al.

Defendants.

Civil Action No. S01-2257 (WDQ)

**JOINT MOTION FOR EXTENSION OF TIME**

The parties in the above-styled case hereby jointly request an extension of time until May 28, 2004 to submit a proposed Consent Decree to the Court. At this point, the parties already have exchanged drafts of the proposed Consent Decree and are now working to complete that document. However, due to the press of other pending litigation, the parties need additional time to finish this task.

Respectfully submitted,

/s/

Philip J. Simon, 12893  
Richard A. Salzman  
Douglas B. Huron, 12888  
Betty Grdina, 15647  
HELLER, HURON, CHERTKOF  
LERNER, SIMON & SALZMAN  
1730 M Street, NW, Suite 412  
Washington, DC 20036  
(202) 293-8090  
(202) 293-7110 (facsimile)

Counsel for Plaintiffs

/s/

---

Jeanne M. Phelan  
WHITEFORD TAYLOR & PRESTON  
Seven Saint Paul Street  
Baltimore, MD 21202-1626  
(410)347-8738  
(410) 347-9446 (fax)

Counsel for Defendants